# SF-83 SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

# **NSPS for Municipal Waste Combustors (Subparts Ea and Eb)**

#### 1. Identification of the Information Collection

#### 1(a) Title of the Information Collection

New Source Performance Standard for Municipal Waste Combustors; 40 CFR Part 60, Subpart Ea and Eb; EPA ICR Number 1506.09; OMB Control Number 2060-0210; expiring March 31, 2002.

#### 1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR Subpart Ea and Subpart Eb were proposed on December 20, 1980 and September 20, 1994 (respectively) and promulgated on February 11, 1991 and December 19, 1995 (respectively). Municipal waste combustor (MWC) facilities which commenced construction after December 20, 1989 and on or before September 20, 1994, or commenced modification or reconstruction after December 20, 1989 and on or before June 19, 1996 are subject to the regulations in 40 CFR Subpart Ea. MWC facilities which commenced construction after September 20, 1994, or commenced modification or reconstruction after June 19, 1996 are subject to the regulations in 40 CFR Subpart Eb. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Ea and Eb.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner or operator subject to the provisions of NSPS Subpart Ea shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. Any owner or operator subject to the provisions of NSPS Subpart Eb shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated State, Tribal, or Local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA Regional Office.

Approximately seven sources are currently subject to the NSPS Subpart Ea, and it is estimated that an additional no sources will become subject to the regulation in the next three years, since its latest applicability date is June 19, 1996. It is further assumed that there is an average of two affected NSPS Subpart Ea facilities per plant per respondent. No sources are currently subject to the NSPS Subpart Eb and it is estimated that an one additional source per year will become subject to the regulation in the next three years. It is further assumed that there

is an average of two affected NSPS Subpart Eb facilities per plant per respondent. The estimates are based on a comprehensive survey of information held and obtained by the EPA Regional Offices in 2000 and 2001. Information was also obtained from the Integrated Waste Service Association.

OMB approved the currently active ICR without any "Terms of Clearance."

#### 2. Need for and Use of the Collection

# 2(a) Need/Authority for the Collection

EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

...application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology. Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

EPA is also charged under Section 129 of CAA, as amended, for NSPS Subpart Eb to establish standards of performance that reflect the maximum achievable control technology for achieving continuous emission reductions that reflect:

the maximum degree of reduction emissions of air pollutants listed...that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air requirements, determines is achievable for new or existing units in each category. Section 129(a)(2)

In addition, Section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit

compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment organic, metal, acid gas, and nitrogen oxide emissions from MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. In addition, the Administrator has judged cadmium, lead, and mercury emissions from certain MWCs to cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category at 40 CFR Part 60, Subpart Ea and Eb.

#### 2(b) Practical Utility/Users of the Data

The control of emissions of organic, metal, acid gas, and nitrogen oxide emissions from MWCs requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of organic, metal, acid gas, and nitrogen oxide emissions from MWCs are the result of operation of the affected facilities. The subject standards are achieved by the capture and reduction of organics, metal, acid gas, and nitrogen oxide emissions using control technology, proper operation and maintenance, and trained personnel. In addition, proper equipment design, operation, and maintenance will capture and reduce cadmium, lead, and mercury emissions from MWCs regulated by Subpart Eb.

The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting is necessary to ensure compliance with the applicable regulations, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

#### 3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR Part 60 Subpart Ea and Eb.

#### 3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated State, Tribal or local agency. If a State, Tribal, or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the State, Tribal, or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

# 3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the <u>Federal Register</u> on October 29, 2001,(66FR54514). No comments were received on the burden published in the <u>Federal Register</u>.

# **3(c) Consultations**

EPA contacted the Integrated Waste Service Association (IWSA) to discuss the ICR. The telephone communication with IWSA helped EPA determine the limited industry growth rate, the reduced number of facilities, and the limited number of new affected facilities expected over the next three years. IWSA represents owners/operators of municipal waste combustors and waste-to-energy facilities.

# 3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

#### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

#### **3(f) Confidentiality**

The required information consists of emissions data and other information that have been determined not to be private. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

# **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

#### 4. The Respondents and the Information Requested

#### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are MWCs. The U.S. Standard Industrial Classification (SIC) codes for the respondents affected by the standards are 9511 (Air and Water Resource and Solid Waste Management) which corresponds to the North American Industry Classification System (NAICS) 562 (Waste Management and Remediation Services) and 924 (Administration of Air and Water Resource and Solid Waste Management Programs). The following table provides additional information on the SIC and NAICS codes.

| Regulation                 | SIC Codes | NAICS Codes                                 |
|----------------------------|-----------|---|
| 40 CFR Part 60, Subpart Ea | 9511      | 924110                                      |
| 40 CFR Part 60, Subpart Ea | 4953      | 56220, 56221, 562213, 562219, and 56292     |
| 40 CFR Part 60, Subpart Eb | 9511      | 924110                                      |
| 40 CFR Part 60, Subpart Eb | 4953      | 56220, 56221, 562213, and 562219, and 56292 |

#### **4(b) INFORMATION REQUESTED**

These standards require affected facilities to maintain certain records for at least two years. Facilities affected by Subpart Eb must maintain records, including reports and notifications, at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent the Part 70 permit program and the five year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

#### (i) Data Items

All data in this ICR that is recorded and/or reported is required by NSPS General Provision (40 CFR Part 60), NSPS for Municipal Waste Combustors (40 CFR Part 60, Subpart

Ea) and NSPS for NSPS for Municipal Waste Combustors (40 CFR Part 60, Subpart Ea).

A source under 40 CFR Subpart Ea or Subpart Eb must make the following reports:

| Reports for 40 CFR Subpart Ea and Subpart Eb                       |  |  |  |  |
|--|--|--|--|--|
| Notification of construction/reconstruction or modification        | 60.7(a)(1), 60.59a(a), 60.59b(a), 60.59b(b), 60.59b(c) |  |  |  |
| Notification of pre-construction plans and public meeting material | 60.59b(a)  |  |  |  |
| Notification of anticipated & actual startup                       | 60.7(a)(2), 60.7(a)(3), 60.59a(a), 60.59b(b), 60.9b(c) |  |  |  |
| Notification related to siting                                     | 60.59b(a)  |  |  |  |
| Notification of initial performance test                           | 60.8(d)  |  |  |  |
| Notification of initial performance test results                   | 60.8(a)  |  |  |  |
| Notification of demonstration of continuous monitoring system      | 60.7(a)(5),  |  |  |  |
| Notification of physical or operational change                     | 60.7(a)(4),  |  |  |  |
| Notification related to opacity                                    | 60.79(a)(6), 60.59b(c)                                 |  |  |  |
| Report on initial performance test results                         | 60.8(a), 60.59a(c), 60.59b(f)                          |  |  |  |
| Report on public meeting (notification and transcript)             | 60.59b(a)(2), 60.59b(a)(3)                             |  |  |  |
| Report on responses to public comment                              | 60.59b(a)(4)   |  |  |  |
| Report on preliminary and final draft materials separation plans   | 60.59b(a)(1)   |  |  |  |
| Report on weights of municipal solid waste and other fuels fired   | 60.59a(m)  |  |  |  |
| Report on performance tests/compliance report                      | 60.8(a), 60.59a(e), 60.59a(g), 60.59b(g)               |  |  |  |
| Report excess emissions  | 60.59a(f), 60.59b(h)                                   |  |  |  |
| Report on CEMS demonstration and test data                         | 60.8(a), 60.59b(f)                                     |  |  |  |
| Report on emission levels during annual test (if necessary)        | 60.59b(d)  |  |  |  |

| Reports for 40 CFR Subpart Ea and Subpart Eb                           |           |  |  |  |
|--|-----------|--|--|--|
| Semi-annual report and explanation for excess emissions (if necessary) | 60.59b(d) |  |  |  |
| Semi-annual carbon report for mercury control (if necessary)           | 60.59b(d) |  |  |  |

A source subject to 40 CFR Subpart Ea or Subpart Eb must maintain the following records:

| Recordkeeping for 40 CFR Subpart Ea and Eb  |                      |  |  |  |  |
|---|----------------------|--|--|--|--|
| Initial performance tests and annual performance tests  | 60.59b(d)            |  |  |  |  |
| Records of periodic testing for fugitive ash emissions  | 60.59b(d)            |  |  |  |  |
| Start-ups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative | 60.7(b)              |  |  |  |  |
| Occurrence, duration of interruptions in operation  | 60.7(b)              |  |  |  |  |
| Records for sources with continuous monitoring systems  | 60.59a(i)            |  |  |  |  |
| Results of daily CEMs drift tests & Appendix F accuracy assessment                                | 60.59b(d)            |  |  |  |  |
| Amounts of sorbent used for mercury control   | 60.59b(d)            |  |  |  |  |
| Persons reviewing operating material  | 60.59a(j), 60.59b(d) |  |  |  |  |
| Records are required to be retained for two years   | 60.59a(b)            |  |  |  |  |
| Records are required to be retained for five years.   | 60.59b(d), 60.59b(e) |  |  |  |  |

# (ii.) Respondent Activities

| Respondent Activities  |  |  |  |  |
|--|--|--|--|--|
| Read instructions.   |  |  |  |  |
| Install, calibrate, maintain, and operate CMS for opacity.   |  |  |  |  |
| Perform initial performance test, Reference Method 19 test, and repeat performance tests if necessary. |  |  |  |  |
| Write the notifications and reports listed above.  |  |  |  |  |
| Enter information required to be recorded above.   |  |  |  |  |

# **Respondent Activities**

Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.

Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.

Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.

Adjust the existing ways to comply with any previously applicable instructions and requirements.

Train personnel to be able to respond to a collection of information.

Transmit, or otherwise disclose the information.

Perform site selection analysis.

Hold public meeting on site analysis and material separation plan.

# 5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management

# 5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

#### **Agency Activities**

Observe initial performance tests and repeat performance tests if necessary.

Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

Audit facility records.

Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

#### 5(b) Collection Methodology and Management

Following notification of start-up, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the

emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into AFS which is operated and maintained by EPA's Office of Air Quality Planning and Standards. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by State, Tribal, and Local regulatory agencies, EPA Regional Offices and EPA Headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by 40 CFR Part 60, Subpart Ea must be retained by the owner or operator for two years. The records required by 40 CFR Part 60, Subpart Eb must be retained by the owner or operator for five years.

#### 5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

The regulations contain a provision for less frequent dioxin/furan testing to allow plants to test only one unit per year rather than all units, as is normally required, if all units at the plant achieve emission levels significantly lower that the emission limits for 2 consecutive years. It is believed that most units will qualify for this option. As most plant have 2 or more units, this provision will reduce dioxin testing frequency, costs, and burden by at least one half starting in the third year after startup of a new MWC. The parameters regulated by the subpart Eb regulation versus those regulated by the subpart Ea regulation are summarized in the following chart:

| Comparison of Parameters Measured by Subparts Ea and Eb   |   |   |  |  |  |
|---|---|---|--|--|--|
| Parameter Subparts Ea Subparts Eb                         |   |   |  |  |  |
| Dioxins/Furans, total                                     | X | X |  |  |  |
| Sulfur Dioxide (SO <sub>2</sub> )/Hydrogen chloride (HCl) | X | X |  |  |  |
| Particulate Matter (PM)                                   | X | X |  |  |  |

| Comparison of Parameters Measured by Subparts Ea and Eb |   |   |  |  |
|---|---|---|--|--|
| Cadmium (Cd)  |   | X |  |  |
| Lead (Pb)   |   | X |  |  |
| Mercury (Hg)  |   | X |  |  |
| Good Combustion Practices (GCP)                         | X | X |  |  |
| Siting  |   | X |  |  |
| Fugitive Emissions                                      |   | X |  |  |
| Opacity   | X | X |  |  |
| Nitrogen Oxides (NO <sub>x</sub> )                      | X | X |  |  |

# **5(d)** Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 2: Industry Burden.

# 6. Estimating the Burden and Cost of the Collection

Table 2: Industry Burden documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for both Subpart Ea and Subpart Eb. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

#### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 11,885 (Total Labor Hours from Table 2). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

#### **6(b) Estimating Respondent Costs**

# (i) Estimating Labor Costs

This ICR uses the following labor rates: \$78.54 per hour for Executive, Administrative, and Managerial labor; \$55.34 per hour for Technical labor, and \$35.64 per hour for Clerical labor. These rates are from the United States Department of Commerce Bureau of Labor Statistics, March 2000, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The wage rates have been increase by 110% to account for the benefit packages available to those employed by private industry.

Managerial \$78.54 (\$37.40 + 110%)
Technical \$55.34 (\$26.35 + 110%)
Clerical \$35.64 (\$16.97 + 110%)

# (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activity in the regulations are labor and CEMs. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

# (iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

| Capital/Sta                                  | Capital/Startup vs. Operation and Maintenance (O&M) Costs for Subparts Ea and Eb |   |   |                                    |  |   |                                |  |
|--|--|---|---|------------------------------------|--|---|--------------------------------|--|
| Regulatory<br>Citation                       | (A)<br>Continuous<br>Monitoring<br>Device  | (B)<br>Startup Cost<br>(\$) for One<br>Affected<br>Facility | (C) No. of New Affected Facilities to Startup | (D)<br>Total<br>Startup<br>(B X C) | (E)<br>Annual O&M<br>Costs (\$) for One<br>Affected Facility | (F) No. of Affected Facilities with O&M | (G)<br>Total<br>O&M<br>(E X F) |  |
| 40 CFR Part<br>60, Subpart Ea                | Yes  | 60,000  | 0   | 0                                  | 8972   | 7                                       | 62804                          |  |
| 40 CFR Part<br>60, Subpart Eb                | Yes  | 60,000  | 1   | 60000                              | 8972   | 1                                       | 8972                           |  |
| Total for<br>Subpart Ea<br>and Subpart<br>Eb | -  | _   | 1 for all 3<br>years of ICR                   | 60000                              | _  | _                                       | 71776                          |  |

The total capital/startup costs for this ICR are \$60,000. This is the total of column D in the above table. These costs are shown in block 14(a), Total annualized capital/startup costs, on the OMB 83-I form. It should be noted that the numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

The total operation and maintenance (O&M) costs for this ICR are \$71,776. This is the

total of column G. These costs are shown in block 14(b), Total annual costs (O&M), on the OMB 83-I form.

The total respondent non-labor costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$131,776. This cost is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. The numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

#### **6(c)** Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the 3 years of the ICR is estimated to be \$11,396 [see Table 1 in Section 6(e)]. This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$36.98.

These rates are from OPM's "2001 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 1, attached.

| 6(d) | Estimating th | e Responden  | t Universe and | l Total Rurden  | and Costs |
|------|---------------|--------------|----------------|-----------------|-----------|
| U(U) | Loumanne u    | c ixesponach | t Omiveise and | i iviai Duiucii | anu Costs |

| Respondent Universe           |                                   |   |                                   |   |  |  |
|-------------------------------|-----------------------------------|---|-----------------------------------|---|--|--|
| Regulation Citation           | (A)<br>No. of New<br>Sources/Year | (B)<br>No. of Initial<br>Reports for<br>New Sources | (C)<br>No. of Existing<br>Sources | (D)<br>No. of Reports for<br>Existing Sources | (E) Total Annual Responses (AxB)+(CxD) |  |
| 40 CFR Part 60,<br>Subpart Ea | 0                                 | 1   | 7                                 | 7   | 49                                     |  |
| 40 CFR Part 60,<br>Subpart Eb | 1                                 | 1   | 0                                 | 0   | 1                                      |  |

The number of total respondents is 7 for Subpart Ea and 1 for Subpart Eb. This number is the sum of Column A and Column C of the Respondent Universe table. This represents the number of existing sources plus the number of new sources averaged over the three-year period. It is shown in block 13 (a), Number of respondents, on the OMB 83-I form.

The number of Total Annual Responses is for 49 for Subpart Ea and 1 for Subpart Eb.

This is the number in column E of the Respondent Universe table. It is shown in block 13 (b), Total annual responses, on the OMB 83-I form. The total annual labor costs are 869,086. This number is not shown on the OMB 83-I form in block 13(c), Total hours requested. Only the burden hours are reflected in block 13(c). Details upon which this estimate is based appear in Table 2. Annual Respondent Burden and Cost.

The total annual capital and O&M costs to the regulated entity are 131,776 (rounded to 132,000). This number is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. These costs are detailed in section 6(b)(iii), Capital/Start-up vs. Operating and Maintenance (O&M) Costs.

#### **6(e)** Bottom Line Burden Hours Burden Hours And Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents appear in Table 2, attached.

#### **6(f)** Reasons for Change in Burden

The decrease in burden from the most recently approved ICR is due to an adjustment. The adjustment decrease in burden from the most recently approved ICR is due to an decrease in the number of sources regulated under both NSPS Subpart Ea and NSPS Subpart Eb. The previous ICR reported that approximately 32 sources were subject to NSPS Subpart Ea and 7 sources were subject to NSPS Subpart Eb. In addition, the previous ICR reported that approximately four sources per year will become subject to NSPS Subpart Eb. A revised estimated, based on up-to-date information and consultation with the Integrated Waste Services Association, indicates that approximately seven sources are currently subject to the NSPS Subpart Ea, no sources are regulated by NSPS Subpart Eb, and only one additional one source per year is expected to become subject to NSPS Subpart Eb in the next three years.

# **6(g)** Burden Statement

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's standards are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to Ms. Susan Auby, Collection Strategies Division (Mail Code 2822), Office of Environmental Information, United States Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460-0001; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number 1506.09 and OMB Control Number 2060-0210 in any correspondence.

# **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.